

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION**

Kevin Turner and Shawn Wooden,
*on behalf of themselves and others
similarly situated,*

No. 2:12-md-02323-AB

Plaintiffs,

MDL No. 2323

v.

National Football League and
NFL Properties LLC, successor-in-interest to
NFL Properties, Inc.,

Hon. Anita B. Brody, U.S.D.J.

Defendants.

THRIVEST SPECIALTY FUNDING, INC.'S MOTION FOR BOND PENDING APPEAL

Thrivest Specialty Funding, LLC (“Thrivest”) respectfully moves the Court under Fed. R. Civ. P. 62(c) and 65(c), and Fed. R. App. P. 8 to require William White or Class Counsel to post a bond pending Thrivest’s appeal of the Court’s May 22, 2018 Explanation and Order, in which the District Court enjoined Thrivest from “seeking arbitration regarding the validity of its funding agreement with Settlement Class Member William White.” The appeal is pending before the Third Circuit as No. 18-2184.

In support of its Motion, Thrivest relies on the accompanying Memorandum of Law.

WHEREFORE, Thrivest respectfully requests that the Court enter an Order requiring William White or Class Counsel to post a bond in the amount of \$788,535.65, or escrow alternate security, pending disposition of the appeal.

Respectfully submitted,

FOX ROTHSCHILD LLP

/s/ Peter C. Buckley

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Dated: June 29, 2018

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CERTIFICATE OF SERVICE

I, Peter C. Buckley, filed the foregoing on June 29, 2018 using the Court's ECF system,
which will provide notice and a copy to counsel of record.

/s/ Peter C. Buckley
Peter C. Buckley, Esquire